

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 2 through 4, 8, 10, 12, and 14 through 18 are pending, with Claims 2, 8, 14, 15, and 17 being independent. Claims 2, 3/2, 4/2, 5/2, 6/2, 8, 10, 12, and 14 remain withdrawn from consideration as non-elected. Claims 15 and 17 have been amended.

Transmitted herewith are 17 replacement sheets of formal drawings comprising Figs. 1 through 17, which are clean copies of the original drawings. Favorable consideration is earnestly solicited.

Claims 15 through 18 were rejected under 35 U.S.C. § 112, 1<sup>st</sup> paragraph, as lacking enablement on the grounds that the specification does not support certain claimed features. All rejections are respectfully traversed.

As regards “enablement”, Applicants respectfully submit that the disclosure fully enables one of ordinary skill in the art to make and use the claimed invention without undue experimentation. There has been no showing of any evidence or reasons to the contrary. See MPEP 2164.04 (citing In re Wright, 27 U.S.P.Q.2d 1510 (Fed. Cir. 1993)), and MPEP 2164.08. (For example, there are no factual findings regarding any quantity of experimentation.) Absent any such evidence or reasons it is respectfully submitted that the rejection is not well-founded. Furthermore, it will be appreciated that a rejection for undue breadth is not appropriate if one of ordinary skill can ascertain which embodiments encompassed by the claim are operative without undue experimentation. See In re Wands, 8 U.S.P.Q.2d 1400, 1404 (Fed. Cir. 1988). Working examples are not required for enablement, and even considerable experimentation is not considered undue if the specification provides a reasonable amount of guidance with respect to

the direction in which experimentation should proceed. *Id.* It is also well-settled that the claims are not limited to the disclosed embodiments. See In re Dinh-Nguyen, 492 F.2d 856, 858-859. MPEP 2164.04, 2164.08.

If “written description” and not “enablement” was the intended grounds of rejection, then Applicants respectfully submit that support for the objected-to claimed features may be found, for example, in the descriptions of Figs. 9, 11, and 13, and in more detail, as follows: (a) calculating first transform conditions (Fig. 11, S1201, p. 21, line 11,  $H_{nm}$ ); (b) obtaining second transform conditions (Fig. 11, S1204, p. 21,  $H_n$ ,  $H_n^{-1}$ ); (c) calculating a respective orientation (Fig. 11, S1204, p. 21,  $H_{vm_n}$ ); and (d) calculating based on the calculated orientations ( $H_{vm_n}$ ,  $H_{vm}$ ) correction transforms (p. 29, line 18,  $H_{vm_s}$ ). **Applicants wish to emphasize that the foregoing citations are provided by way of example and not of limitation — the claims are not limited to the disclosed embodiments.** In view of the foregoing, Applicants respectfully submit that the artisan would have thought that Applicants were in possession of the claimed invention. MPEP 2163.02, 2163.04. Therefore, written description is also present.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

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